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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No.
)
Plaintiff,) <u>COUNT 1:</u>
) CONSPIRACY TO COMMIT
vs.) WIRE FRAUD
) Vio. of 18 U.S.C. §§ 371 and 1343
DMITRY KUDRYN,)
) <u>COUNT 2:</u>
Defendant.) WIRE FRAUD
) Vio. of 18 U.S.C. § 1343
)
)

INDICTMENT

The Grand Jury charges that:

COUNT 1

CONSPIRACY TO COMMIT WIRE FRAUD

1. Beginning on a specific date unknown to the grand jury, but within the month of July 2014, and continuing to the present date, in the District of Alaska and elsewhere, the defendant DMITRY KUDRYN, along with other uncharged co-conspirators, did knowingly and unlawfully combine, conspire, confederate, and agree together to commit the following violation against the United States, to wit: fraud by wire, in violation of Title 18, United States Code, Section 1343.

OBJECT OF THE CONSPIRACY

2. It was the object of the conspiracy that the defendant, DMITRY KUDRYN, along with other uncharged co-conspirators, sought to obtain money by materially false or fraudulent pretenses, representations or promises, to wit, participating in a scheme to defraud various individuals in the District of Alaska by importing no less than \$300,000 worth of furniture manufactured by the DUOXIEYI SOFA COMPANY in the People's Republic of China and then falsely and fraudulently offering and advertising the furniture for retail sale on the Craigslist.com platform in Alaska as having been manufactured in Italy.

MANNER OF THE CONSPIRACY

3. This is a scheme to defraud consumers in Alaska by falsely representing furniture manufactured in China as having been manufactured in Italy. During the course of the conspiracy, DMITRY KUDRYN, along with other uncharged co-conspirators purchased at least \$300,000 worth of wholesale furniture from the DUOXIEYI SOFA COMPANY in Fashon, China, facilitated by wire communications made by KUDRYN from his cell phone number (907) 841-xxxx and email address xxxxxxxx@wireovia.com, and the use of the internet marketplace Craigslist.com.

4. KUDRYN and his uncharged co-conspirators would then offer that same furniture for sale in Alaska, primarily by means of wire communications facilitated by the Craigslist.com internet marketplace, his cellphone (907) 841-xxxx, and email address xxxxxxxx@wireovia.com. Those Craigslist advertisements for retail sale would represent the furniture purchased from and manufactured by the DUOXIEYI SOFA COMPANY in the People's Republic of China as having been manufactured in Italy. KUDRYN would also materially mislead consumers by representing that the furniture purchased in bulk and delivered to his commercial property in Wasilla, Alaska were leftover samples, and that the furniture was being offered at a discounted price.

OVERT ACTS

5. DMITRY KUDRYN, along with other un-charged co-conspirators, would engage in conduct including but not limited to the following overt acts in furtherance of the conspiracy to commit wire fraud between July 2014 and March 2018:

- Purchasing in excess of \$300,000 dollars' worth of furniture by means of wire communications to the DUOXIEYI SOFA company in Foshan, China, in at least 12 separate lots, between July 2014, and March 2018, with each unit purchased from DUOXIEYI SOFA costing KUDRYN approximately \$1050.
- Shipping the furniture purchased from the DUOXIEYI SOFA company from Foshan, China through various United States Customs ports of entry to his warehouse in Wasilla, Alaska.
- Advertising the furniture purchased from the DUOXIEYI SOFA company for retail sale in Alaska at his Wasilla warehouse by means of wire communications by and through the Craigslist.com internet marketplace.
- Fraudulently representing in Cragislist.com advertisements ("posts") that the furniture manufactured in China was "Italian leather furniture."

- Fraudulently representing in the Craigslist.com advertisements that each furniture unit was worth \$4800 “shipped from the lower 48”
- Fraudulently representing in the Craigslist.com advertisements that the furniture advertised for sale were “seconds” or leftover furniture from staging in new home construction.
- Arranging for the retail sale of the furniture to private individuals in Alaska for approximately \$2400 per unit based on the fraudulent, material misrepresentations made by means of wire communications using instrumentalities of interstate commerce including but not limited to the Craigslist.com internet platform; the cell phone number (907) 841-xxxx and the email address xxxxxxxx@wireovia.com.

All of which is in violation of 18 U.S.C. §§ 371 and 1343

COUNT 2

The Grand Jury adopts all of the allegations contained within Count 1 of this Indictment into this count.

Beginning on or about July 2014 and continuing to the present date, the defendant, DMITRY KUDRYN, in the District of Alaska and elsewhere, did with the intent to defraud, or to obtain money by means of false or fraudulent pretenses, caused writings, signs, and signals, to be transmitted in interstate commerce by means of wire communications, to wit emails and

electronic advertisements, including but not limited to those made using the telephone number (907) 841-xxxx, the email address xxxxxxxx@wireovia.com and advertisements and communications made using the Craigslist.com internet marketplace platform, all made for the purpose of executing the scheme to defraud and fraudulently represent that furniture offered for sale on Craigslist.com internet marketplace platform had been manufactured in Italy when in truth and fact the furniture offered for sale on Craigslist.com internet marketplace platform had been manufactured in China.

All of which is in violation of 18 U.S.C. § 1343.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Adam Alexander
ADAM ALEXANDER
United States of America
Assistant U.S. Attorney

s/ Bryan Schroder
BRYAN SCHRODER
United States of America
United States Attorney

DATE: 5/15/18